

Serial No. 09/929,047

REMARKS

In the January 5, 2005 Office Action claims 1-9 were rejected under 35 U.S.C. 112, first paragraph and claims 1-9 were rejected under 35 U.S.C. 103(a). Claims 1-9 remain in the case. Claims 1 and 7-9 are herein amended. No new matter has been added. The rejections are traversed below.

ITEM 2: Rejection of claims 1-9 under 35 U.S.C. § 112, ¶1

In the January 5, 2005 Office Action claims 1-9 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Specifically, the rejection states that the "specification's definition of 'preset threshold' is unclear as to whether the software or the purchaser is creating the value."

35 U.S.C. § 112 ¶1 requires: "the specification shall contain a written description of the invention, and of the manner and process of making and using it".

The issues raised in the January 5, 2005 Office Action are: (1) whether the "claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the art that the inventors, at the time the application was filed, had possession of the claimed invention" and (2) whether the "specification's definition of 'preset threshold' is unclear as to whether the software or the purchaser is creating the value [enablement]."

It is submitted that the specification meets the requirements of 35 U.S.C. § 112, first paragraph, regardless of who or what sets the threshold. The specification at page 17, line 18 describes "a preset threshold value [LnetR-mg]." The specification at page 21, lines 16-17 defines how the preset threshold [LnetR-mg] may be set. "The threshold value [LnetR-mg] can be changed through setting using the input section 1." In these examples the specification defines "preset threshold" in a manner that shows that the "preset threshold" can be changed by setting the value in the input section (see also, Fig. 1, element 1 and Fig. 11, element SA1).

Further details are provided in the specification at page 25, line 18 to page 26, line 9. For example, "[LnetR] serves as a first threshold value ... for a preset threshold value [LnetR-mg]" (page 25, line 25 to page 26, line 1) and "when the total resistance value [LnetR] is less than the preset threshold value [LnetR-mg], all elements are analyzed as RLC models" (page 26, lines 4-6). At least these portions of the specification show that the claimed threshold are sufficient to enable any person skilled in the art to have the threshold level set in an appropriate manner for a given implementation of the invention.

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It is submitted that the written description of the specification as originally filed complies with the requirements of 35 U.S.C. § 112, first paragraph. Therefore, the rejection is traversed and withdrawal of the rejection is respectfully requested.

ITEM 4: Rejection of claims 1-9 under 35 U.S.C. § 103(a)

In the January 5, 2005 Office Action claims 1-9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Srivastava et al. ("Symbolic Approximation of Analog Circuits Using Sspice," IEEE (1990)) in view of Nabors et al. (USP 6,088,523 (2000)).

The application is directed to wiring pattern analysis by analyzing RLC models and high-frequency element models in combination. Operations performed include conversion of RLGC lines to RLC lines and superimposing a skin resistance value on a DC resistance value. Analysis delays are reduced by using a high-frequency element having a small high-frequency-element analysis delay time. As discussed below, neither Srivastava nor Nabors teaches or suggests all of the claim limitations of this characteristic structure. Thus, the applied art of record cited in the January 5, 2005 Office Action, Srivastava and Nabors either combined together or considered individually, does not make the invention obvious. Furthermore, the Office Action fails to establish a case of *prima facie* obviousness at least because the Office Action is silent as to some suggestion or motivation to combine the references.

As amended, independent claim 1 recites an

analysis unit which executes an analysis by using **at least one of the elements** corresponding to an integrated resistance value as a RLC model and **using other elements** than the **at least one of said elements** as high-frequency element models when said second determination unit determines that the integration result reaches the value immediately before the second threshold value

(claim 1, last 5 lines). Nothing has been cited in either Srivastava or Nabors related to analyzing RLC and high-frequency element models as recited in the quotation above. The only portions of Srivastava that were cited were "Sspice Element Definitions" on page 509 and use of a threshold at lines 22-26 on page 510 (discussed below). It is unclear where the "Sspice Element Definitions" are provided on page 509, but it is not understood how definitions of elements could teach or suggest the analysis recited in claim 1. The only time "frequency" is mentioned in Nabors is the statement that in equation in column 7, "s is a complex frequency" (column 7, line 52) and that "frequency dependent circuit element quantities can be manipulated just as the resistors, capacitors, inductors, and conductances" (column 26, lines 7-9). Thus, the Office Action fails to establish a case of *prima facie* obviousness regarding the analysis unit recited in claim 1.

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In the January 5, 2005 Office Action, it is asserted "Srivastava: pg. 510, lines 22-26" discloses "equal to or larger than the first threshold value" (Office Action, page 4, lines 11-12). However, the cited portion of Srivastava relates to whether "to discard some terms from the answer if their relative magnitude falls below a certain threshold" which has nothing to do with "whether the total resistance value is less than a first threshold value" (claim 1, lines 8-9). The mere fact that Srivastava uses a threshold for some purpose does not make it obvious to use thresholds as recited in claim 1.

In addition, the Office Action failed to provide any basis for the assertion at page 4, lines 18-22 that column 8, lines 19-25 of Nabors discloses "an analysis ... using at least one of the elements corresponding to an integrated resistance value as a RLC model and using other elements than the at least one of said elements as high-frequency element models" (claim 1, lines 18-21). For the above reasons, claim 1 is patentable over the applied art of record Srivastava in view of Nabors either considered individually or combined together.

Dependent claims 2-6 are patentable over the applied art of record Srivastava in view of Nabors either considered individually or combined together for at least the same reasons that independent claim 1 is patentable over the applied art.

Claims 7-9 all recite that an analysis is performed using language similar to that quoted above describing how the analysis unit operates. Therefore, it is submitted that claims 7-9 are patentable over the applied art of record Srivastava in view of Nabors either considered individually or combined together for the reasons discussed above with respect to claim 1.

CONCLUSION

It is submitted that the references cited in the January 5, 2005 Office Action, taken individually or in combination, do not teach or suggest the features of the present claimed invention and for all of the reasons presented above, a case of *prima facie* obviousness has not been established in the Office Action.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

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If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: 4-13-05

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